

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COOKEVILLE DIVISION**

IN RE:

Angelia Nichole Shockley,

Debtor(s).

)
)
)
)
)

BK No. 19-00138-MH2-7

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: October 13, 2020
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: November 5, 2020 at 9:30 a.m. by AT&T
conference line number 1-888-363-4749, Access Code 6926390#

NOTICE OF MOTION TO EXTEND SEC 727 AND/OR 523 COMPLAINT DEADLINE FOR FILING
COMPLAINTS OBJECTING TO DISCHARGE

Erica R. Johnson, Trustee, has asked the court for the following relief: to extend the time for the Trustee and United States Trustee to file a Complaint objecting to Debtor's discharge.

YOUR RIGHTS MAY BE AFFECTED. If you do not want the court to grant the attached motion by entering the attached order, or if you want the court to consider your views on the motion, then on or before the response date stated above, you or your attorney must:

1. File with the court your response or objection explaining your position. Please note: the Bankruptcy Court for the Middle District of Tennessee requires electronic filing. Any response or objection you wish to file must be submitted electronically. To file electronically, you or your attorney must go to the court website and follow the instructions at: <https://ecf.tnmb.uscourts.gov>.

If you need assistance with Electronic Filing you may call the Clerk's Intake Department at (615) 736-5584.

2. Your response must state the deadline for filing responses, the date of the scheduled hearing and the motion to which you are responding.

If a response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. **THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.** You may check whether a timely response has been filed by viewing the case on the court's website at <https://ecf.tnmb.uscourts.gov>.

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter the attached order granting that relief.

This 22nd day of September, 2020

/s/ Erica R. Johnson, Trustee

Erica R. Johnson, Trustee
ERICA R. JOHNSON,
ATTORNEY AT LAW, PLLC
8161 Highway 100, Suite 184
Nashville, Tennessee 37221
(615) 347-5869 – Telephone
erjtrustee@erjlaw.com - Email

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COOKEVILLE DIVISION**

IN RE:)
)
Angelia Nichole Shockley,) **BK No. 19-00138-MH2-7**
)
Debtor(s).)

**MOTION TO EXTEND SEC 727 AND/OR 523 COMPLAINT DEADLINE FOR FILING
COMPLAINTS OBJECTING TO DISCHARGE**

Comes Erica R. Johnson, Trustee in the above-captioned bankruptcy proceeding, (the “Trustee”) and moves the Court to extend the deadline for the Trustee and the United States Trustee to file complaints objecting to the discharge of the above-referenced Debtor for ninety (90) days from September 29, 2020, or until December 28, 2020.

For cause, the Trustee would state that further investigation is needed to determine whether grounds exist to object to the discharge pursuant to §727 of the Bankruptcy Code.

This the 22nd day of September, 2020.

Respectfully submitted,

/s/ Erica R. Johnson, Trustee
Erica R. Johnson, Trustee
ERICA R. JOHNSON,
ATTORNEY AT LAW, PLLC
8161 Highway 100, Suite 184
Nashville, Tennessee 37221
(615) 347-5869 – Telephone
erjtrustee@erjlaw.com - Email

CERTIFICATE OF SERVICE

I hereby certify that I have forwarded a true and exact copy of the Motion to Extend Sec 727 and/or 523 Complaint Deadline for Filing Complaints Objecting to Discharge; *proposed* Order; and Notice of Motion via CM/ECF Email Notice/Service to the U.S. Trustee, ustpregion08.na.ecf@usdoj.gov; via CM/ECF Email Notice/Service to the attorney for the Debtor; and via U.S. Mail to Angelia Shockley, 2088 Buffalo Valley Road, Cookeville, TN 38501 on this 22nd day of September, 2020.

/s/ Erica R. Johnson
Erica R. Johnson

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COOKEVILLE DIVISION**

IN RE:)
)
Angelia Nichole Shockley,) BK No. 19-00138-MH2-7
)
Debtor(s).)

**PROPOSED ORDER EXTENDING THE SEC 727 AND/OR 523 COMPLAINT
DEADLINE FOR FILING COMPLAINTS OBJECTING TO DISCHARGE**

Upon Motion of the Trustee, and for good cause shown, twenty-one (21) days notice having been given pursuant to LBR 9013-1 of this Court, and no adverse interest appearing or objections having been filed;

It is ORDERED that the deadline for the Trustee and the United States Trustee to file complaints objecting to the discharge of the above-referenced Debtor is hereby extended for ninety (90) days from September 29, 2020, or until December 28, 2020.

This order was signed and entered electronically as indicated at the top of the first page.

Submitted for Entry:

/s/ Erica R. Johnson, Trustee
Erica R. Johnson, Trustee
ERICA R. JOHNSON,
ATTORNEY AT LAW, PLLC
8161 Highway 100, Suite 184
Nashville, Tennessee 37221
(615) 347-5869 – Telephone
erjtrustee@erjlaw.com - Email